

REMARKS

Claims 1-35 are pending in the present application. Claims 1-35 have been rejected. No claims have been allowed, canceled or added. Claim 1 has been amended for purposes of clarification such that no narrowing of claim scope has been accomplished.

I. Rejections under 35 U.S.C. § 102

Claim 1 stands rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,741,183 to Acres et al. ("Acres"). Although not explicitly stated in the Office Action, Applicant also understands claims 2-7, 10-23, 25 and 27-35 to also be rejected as anticipated by Acres. Applicants respectfully traverse these § 102 rejections.

In order to anticipate a claim, a reference must include every material element of that claim. Claim 1 recites, *inter alia*, 1) "at least one standard receptor slot for securing at least one other component to the main communication board," 2) a "daughter board configured to plug into the receptor slot of the main communication board," wherein 3) the daughter board is configured to "receive power from the main communication board," and wherein 4) "said daughter board compris[es] conversion circuitry for converting signals between the first communication format and a second communication format." As set forth above, the Office Action rejects claim 1 as being anticipated by Acres, thereby taking the position that Acres contains every material element of claim 1. Applicants respectfully submit that Acres has not been shown to contain every material element of claim 1, however, and in particular has not been shown to contain any of the four specific elements listed above, each of which is required for a proper finding of anticipation. Furthermore, although believed to be already present in the original claim, claim 1 has been amended further to clarify the location of the main communication board on the communication paths within the claimed communication interface, which clarifying amendment is believed to further distinguish over Acres.

In addition, independent claim 14 recites, *inter alia*, “a daughter board” having “a standard connector for plugging into a standard receptor slot of a main communication board on the gaming machine” and “conversion circuitry for converting signals from said first communication format to said second communication format.” Furthermore, independent claims 29 and 30 both recite a “first daughter board,” a “first standard receptor slot of the main communication board,” that the “first daughter board converts signals in a first communications format from the master gaming controller to signals in a second communications format for transmission,” the step of “replacing the first daughter board with [another] daughter board in the first standard receptor slot of the main communication board,” and that the “[other] daughter board converts signals . . . to signals in a communications format, other than the first communication format.” Claim 30 further recites yet an additional “[other] daughter board” in a “second standard receptor slot of the main communication board,” and that this additional “[other] daughter board converts signals in a first communications format from the master gaming controller to signals in a third communications format.” As in the case of claim 1, Applicants respectfully submit that Acres has not been shown to contain every material element of any other independent claim (i.e., claims 14, 29, or 30), and in particular has not been shown to contain any of the specific elements recited above, each of which is required for a proper finding of anticipation.

The Office Action states at page 2 that “Acres discloses . . . main communication board (fig.2, 202) and a daughter board (expansion device) connected to the main communication board, (col. 16, lines 56-65, wherein expansion connector (fig.9, 206) allows the DCN controller to communicate with expansion device),” as well as a “daughter board comprising conversion circuitry (fig.3, 66) for converting signals between [] communication format[s].” Assuming *arguendo*, however, that the Personality Board 202 of Acres represents a “main communication board” as is presently claimed, then: 1) no daughter board

has been shown, 2) the main communication board (i.e., Personality Board) has not been shown to have at least one standard receptor slot for securing a daughter board, 3) no daughter board has been shown to be configured to receive power from the main communication board (i.e., Personality Board), and 4) no conversion circuitry for converting signals between communication formats within a daughter board has been shown.

Daughter board

The Office Action ambiguously alludes to a daughter board in Acres as being an “expansion device,” yet fails to specify which, if any, exact item or items disclosed within Acres could represent such an expansion device or daughter board. Although the Office Action does refer to Acres at col. 16, lines 56-65 and Figures 2 and 9, a careful reading of these items does not result in any mention of a daughter board. As stated by Acres here, “personality board 202 includes two connectors 204 and 206 [and] connector 204 couples to the data communication node 42, [while] connector 206 connects to the particular gaming device.” In addition, Figures 2 and 9 show that personality board 202 is connected “TO MACHINE” via connector 206. Furthermore, Acres states at col. 8 lines 40-47 that “each gaming device includes therein an electronic module 40, as shown in FIG. 2, [wherein] module 40 includes . . . a data communication node 42.”

Although the Office Action asserts at page 2 that “expansion connector (fig.9, 206) allows the DCN controller to communicate with expansion device,” it is clear from Acres that *connector 206 connects to a gaming device or machine*. In fact, no mention of a daughter board is made as an item to which connector 206 could connect, and Applicants respectfully submit that while possible, an assumption that this *must* be the case would be entirely improper in light of that which has been shown. Similarly, while connector 204 connects to DCN 42, this DCN is merely a part of larger electronic module 40. As is well known to those reasonably skilled in the art, however, a module is not necessarily a daughter board, and can

be many different things, such as a self-contained single chip, for example. In fact, the Office Action has made no showing of a daughter board with respect to DCN 42 or electronic module 40. Applicants thus respectfully submit that because such items can be formulated in a variety of ways, any assumption that one must comprise a daughter board is likewise entirely improper. Since no other items are shown to be connected to Personality Board 202, Applicants respectfully submit that nothing else could possibly comprise “a daughter board plugged into the receptor slot of the main communication board,” as is claimed, and that the Office Action has thus failed to show that Acres discloses such a daughter board. Because a daughter board is contained in every one of the present claims, Acres has not been shown to anticipate any of these claims.

Standard receptor slot

The Office Action refers to col. 16 lines 56-65 and Figure 9, item 206 of Acres as showing a “standard receptor slot,” as is presently claimed. Again, a careful reading of these items does not result in any mention of a standard receptor slot. Instead, only “connectors 204 and 206” are specified, which connectors could comprise a wide variety of different items. In fact, no mention of a standard receptor slot is made at this recited passage, and Applicants respectfully submit that an assumption that either connector 204 or 206 *must* comprise such a receptor slot would be entirely improper. Accordingly, Acres has not been shown to anticipate any claims that include the element of a “standard receptor slot.”

Additional daughter boards

Independent claims 29 and 30 both recite to “replacing a first daughter board with a second [or third] daughter board.” In asserting that this material element is found within Acres, the Office Action points to Acres at col. 9, lines 55-67 and col. 10, lines 41-67 and states at page 4 that “wherein converter 66 converts inputs to output which is transmitted to controller via conductor 46, wherein machine configuration identifies the type of machine

that connected, disable device not identifies no match.” A careful reading of both of these passages from Acres, however, does not result in any mention of *any* daughter board, much less the step of replacing of a first daughter board with a second daughter board. In fact, nothing in either of these passages refers to the replacing of any component, much less one daughter board with another. Because the Office Action has made no showing of a step of “replacing a first daughter board with a second [or third] daughter board,” Applicants respectfully submit that Acres has not been shown to anticipate either of these claims.

In addition, claim 30 further recites to providing yet another daughter board in a second standard receptor slot of the main communication board. The Office Action never addresses this additional material element, however, and Applicants respectfully submit that an appropriate showing for such an element is required for an anticipation rejection to be proper. Accordingly, Applicants respectfully submit that independent claim 30 is not anticipated by Acres for at least this additional separate reason.

In sum, because it has not been shown to include at least a daughter board, Acres has not been shown to anticipate any of independent claims 1, 14, 29 or 30. Furthermore, Acres has also not been shown to anticipate any of these independent claims for the additional reasons that it has not been shown to contain one standard receptor slot or connector for a daughter board, nor conversion circuitry within a daughter board for converting signals between a first communication format and a second communication format. In addition, Acres has not been shown to anticipate claims 29 and 30 for further separate reasons set forth above. Because each of dependent claims 2-13, 15-28 and 31-35 depend from one of independent claims 1, 14 and 30, these claims have also not been shown to be anticipated by Acres for at least the same reasons as provided for these claims. Accordingly, Applicants respectfully request the withdrawal of these § 102 rejections with respect to claims 1-7, 10-23, 25 and 27-35.

II. Rejections under 35 U.S.C. § 103

Claims 8 and 24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Acres alone. Although not explicitly stated in the Office Action, Applicants also understand claims 9 and 26 to also be rejected as being unpatentable over Acres alone. Applicants respectfully traverse these rejections.


As detailed in the foregoing section, independent claims 1 and 14 have not been shown to be unpatentable over the prior art for a number of reasons. Dependent claims 8 and 9 depend from claim 1, while dependent claims 24 and 26 depend from claim 14. Accordingly, Applicants respectfully submit that claims 8-9, 24 and 26 are patentable over the prior art for at least the same reasons as those provided for claims 1 and 14, and request the withdrawal of the § 103 rejections with respect to these claims.

CONCLUSION

Applicants respectfully submit that all claims are in proper form and condition for patentability, and request a Notification of Allowance to that effect. Outside the fee for the Petition for Extension of Time, is believed that no other fee is due at this time. Should the check for the time extension be inadvertently omitted, or should any other fee be required for any reason related to this document, then the Commissioner is hereby authorized to charge said fee to Deposit Account No. 50-0388, referencing Docket No. IGT1P022. The Examiner is respectfully requested to contact the undersigned attorney at the telephone number listed below with any questions or concerns relating to this document or application.

Respectfully Submitted,
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